

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

Lighthouse Consulting Group, LLC,

Plaintiff,

v.

Citizens Financial Group, Inc.,

Defendant.

Civil Action No. 2:19-cv-00340-JRG
LEAD CONSOLIDATED CASE

Jury Trial Demanded

DECLARATION OF CHRISTOPHER J. JOHNSON
PURSUANT TO 28 U.S.C. § 1746


I, Christopher J. Johnson, declare as follows:

1. I am currently employed by Citizens Financial Group, Inc. ("Citizens" or "Defendant") and have worked there for almost three years.
2. My job title at Citizens is Senior Vice President of Digital Applications.
3. My current business address is 685 Greenville Ave (One Citizens Bank Way), Johnston, RI 02919.
4. I make this declaration in support of Citizens' Motion to Stay in the above-captioned matter.
5. I have been asked to explain some background information related to Citizens' use of the accused mobile check deposit technology at issue in the matter.
6. I understand that Lighthouse Consulting Group LLC ("Lighthouse") has filed a complaint against Citizens accusing a mobile check deposit system of infringing U.S. Patent Nos. 8,590,940 and 7,950,698 (reissued as U.S. Reissue Patent No. 44,274) (collectively, the "Asserted Patents").

7. Based on my position at Citizens, I understand that NCR provides the accused mobile deposit system to Citizens.
8. Citizens requested that NCR indemnify it against Lighthouse's claims pursuant to an agreement with NCR, and NCR has agreed to defend Citizens in the matter.
9. I understand that, on December 3, 2019, NCR filed a Complaint for Declaratory Judgment seeking (a) that the accused NCR products do not infringe the Asserted Patents; (b) that the Asserted Patents are invalid; and (c) that Lighthouse be enjoined from proceeding with any litigation against NCR's customers over the Asserted Patents (the "Declaratory Judgment Litigation"). *NCR Corp. v. Lighthouse Consulting Group, LLC*, No. 1:19-cv-00392 (E.D. Tex.).
10. Citizens agrees to be bound by all decisions or orders from the Declaratory Judgment Litigation regarding claim construction, non-infringement or infringement, and invalidity or validity of the Asserted Patents.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 5, 2020.



Christopher J. Johnson

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